

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Lionel White,)
)
Plaintiff)
) No. 17 CV 2877
-vs-) Judge Sharon Johnson Coleman
)
City of Chicago, et al.,)
)
Defendants.)
)
)

PLAINTIFF'S RULE 26(a)(1) DISCLOSURES

Rule 26(a)(1)(A)(i). Individuals likely to have discoverable information that Plaintiffs may rely on to support his claims:

The following individuals have knowledge of facts underlying Plaintiff's claims

1. Lionel White, Plaintiff, can be reached through counsel
2. Kimberly Collins, [REDACTED]
3. Rasaan Brakes, contact information not currently known
4. Ronald Watts, Defendant, can be reached through counsel
5. Phillip Cline, Defendant, can be reached through counsel
6. Debra Kirby, Defendant, can be reached through counsel
7. Alvin Jones, Defendant, can be reached through counsel
8. Elsworth Smith, Jr., Defendant, can be reached through counsel
9. Kallatt Mohammed, Defendant, can be reached through counsel
10. Manuel Leano, Defendant, can be reached through counsel
11. Brian Bolton, Defendant, can be reached through counsel
12. Robert Gonzalez, Defendant, can be reached through counsel
13. Douglas Nichols, Defendant, can be reached through counsel

The following individuals may have knowledge of the Code of Silence within CPD and the steps the City took in response to allegations of Watts' misconduct:

14. Shannon Spaulding, has knowledge of the code of silence within CPD, especially as it relates to Watts and his tactical team, last known counsel: Christopher Smith, 1 N. LaSalle Street Suite 2000, Chicago, Illinois (312) 432-0400.

15. Michael Spaargaren, has knowledge of the code of silence within CPD, especially as it relates to Watts and his tactical team, address currently unknown, [REDACTED]

16. Pete Koconis, retired police officer has knowledge of the CPD investigation into Watts and his tactical team, address currently unknown, ([REDACTED])
17. Rahm Emanuel, Mayor of the City of Chicago, has knowledge of the Code of Silence that exists within the Chicago Police Department, 121 N. LaSalle Street, Chicago City Hall 4th Floor, Chicago, Illinois 60602
18. Calvin Holliday, contact information unknown
19. Ray Broderdorf, contact information unknown
20. Kenneth Mann, contact information unknown
21. Joel Howard, contact information unknown
22. Joe Barnes, contact information unknown
23. Thomas Chester, contact information unknown
24. Allen Boehmer, contact information unknown
25. Keith Calloway, contact information unknown
26. Tim Moore, contact information unknown
27. Kenneth Biggs, contact information unknown
28. Daniel Echeverria, contact information unknown
29. Juan Rivera, contact information unknown
30. Tina Skahill, contact information unknown
31. Robert Klimas, contact information unknown

The following individual may have knowledge of the Defendant Officers' other acts of misconduct:

32. Ben Baker, can be reached through counsel, Loevy & Loevy
33. Clarissa Glenn, can be reached through counsel, Loevy & Loevy
34. Lee Rainey, can be reached through his counsel, Josh Tepfer at the Exoneration Project.
35. Leonard Gipson, can be reached through his counsel, Josh Tepfer at the Exoneration Project.
36. Marcus Gibbs, can be reached through his counsel, Josh Tepfer at the Exoneration Project.
37. Jamell Sanders, can be reached through his counsel, Josh Tepfer at the Exoneration Project.
38. Christopher Scott, can be reached through his counsel, Josh Tepfer at the Exoneration Project.
39. William Carter, can be reached through his counsel, the Law Offices of Kenneth N. Flaxman.
40. Thomas Jefferson, can be contacted through his counsel Josh Tepfer at the Exoneration Project
41. Allen Jackson, can be contacted through his counsel Josh Tepfer at the Exoneration Project
42. Jamar Lewis, can be contacted through his counsel Josh Tepfer at the Exoneration Project

43. Phillip Thomas, can be contacted through his counsel Josh Tepfer at the Exoneration Project

44. Andre McNairy, can be contacted through his counsel Josh Tepfer at the Exoneration Project

45. Henry Thomas, can be contacted through his counsel Josh Tepfer at the Exoneration Project

46. Lionel White Jr., can be contacted through his counsel Josh Tepfer at the Exoneration Project

47. Shaun James, can be contacted through his counsel Josh Tepfer at the Exoneration Project

48. Taurus Smith, can be contacted through his counsel Josh Tepfer at the Exoneration Project

49. Frank Saunders, can be contacted through his counsel Josh Tepfer at the Exoneration Project

50. Bruce Powell, can be contacted through his counsel Joel Flaxman.

51. Sondra Cartwright, has knowledge of the Defendant Officers' other acts of misconduct, current address unknown

Plaintiffs' investigation into this matter continues. Plaintiffs reserve the right to modify and supplement these disclosures as additional information becomes available. In addition, Plaintiffs hereby disclose and incorporate by reference all witness disclosed by any other party in this matter.

Rule 26(a)(1)(A)(ii). Documents, electronically stored information, and tangible things in Plaintiffs' possession custody or control that he may use to support their claims:
Rule 26(a)(1)(b)

- LIONEL WHITE 00016-00016 – 06 CR 12092 COI order
- LIONEL WHITE 00017-00047 – 06 CR 12092 COI petition
- LIONEL WHITE 00048-00141 – 06 CR 12092 CPD subpoena response
- LIONEL WHITE 00142-00143 – 06 CR 12092 docket sheet
- LIONEL WHITE 00144-00293 – 06 CR 12092 IDOC subpoena
- LIONEL WHITE 00294-00297 – 06 CR 12092 indictment
- LIONEL WHITE 00298-00331 – 06 CR 12092 motion to vacate
- LIONEL WHITE 00332-00333 – 06 CR 12092 order vacating conviction
- LIONEL WHITE 00334-00351 – 06 CR 12092 transcript June 26 2006
- LIONEL WHITE 00352-00363 – Cermak records
- LIONEL WHITE 00364-00365 – Court of claims order
- LIONEL WHITE 00366-00374 – CPD FOIA response (reports)
- LIONEL WHITE 00375-00375 – CPD FOIA response (CR)
- LIONEL WHITE 00376-00379 – Kimberly Collins affidavit
- LIONEL WHITE 00380-00397 – Provident records
- LIONEL WHITE 00398-00403 – Rasaan Brakes affidavit
- LIONEL WHITE 00404-00404 – Rasheed Brakes affidavit

- BAKER GLENN 000001-001294 – documents from Ben Baker’s criminal cases 05 CR 8982 and 06 CR 810
- BAKER GLENN 001295-001475 – USA v. Watts materials
- BAKER GLENN 001476-001495 – dispositions on Baker criminal cases
- BAKER GLENN 001496-001551 – Court of Claims materials
- BAKER GLENN 001552-001934 – Baker CCSAO FOIA requests
- BAKER GLENN 001935-002073 – Baker CPD FOIA
- BAKER GLENN 002074-002963 – Baker FBI FOIA
- BAKER GLENN 001964-004369 – Motion to Appoint Special Prosecutor Exhibits
- BAKER GLENN 004370-004880 – Klipfel v. Rubin materials
- BAKER GLENN 004881-004911 – assorted media reports
- BAKER GLENN 004912-004942 – Baker criminal cases court orders
- BAKER GLENN 004943-005017 – Baker criminal cases assorted transcripts
- BAKER GLENN 005018-005047 - 05 CR 8982 – Mot. to Supplement Record on Appeal
- BAKER GLENN 005048-005133 - 07 CR 24156 - People v. Cartwright transcripts
- BAKER GLENN 005134-005297 - DOJ Report - January 2017
- BAKER GLENN 005298-005466 - Koschman Report - September 2013
- BAKER GLENN 005467-005505 - Webb Report - November 1997
- BAKER GLENN 005506-005506 - 1999 June 9 Tillman Resolution
- BAKER GLENN 005507-005994 - Police + Fire Committee Records & Transcripts
- BAKER GLENN 005995-005996 - Beavers Resolution re FOP
- BAKER GLENN 005997-006004 - 6-2006 Report re Citizen Complaints
- BAKER GLENN 006005-006017 - Police + Fire Committee Mtg Minutes - 2002-2005
- BAKER GLENN 006018-006186 - Clark v Chicago - Fakuade Dep
- BAKER GLENN 006187-006218 - Clark v Chicago - Waller Report
- BAKER GLENN 006219-006400 - CPD Annual Reports 2001-2005
- BAKER GLENN 006401-006401 - CPD Dept-Wide Complaint History - 2000 -2005
- BAKER GLENN 006402-006657 - Obrycka v City of Chicago Documents
- BAKER GLENN 006658-006659 - Baker - court of claims order - May 13 2016
- BAKER GLENN 006660-006671 - Brzeczek affidavit - Jan 26 2016
- BAKER GLENN 006672-006711 - Klipfel - Brian Netols dep June 16 2005
- BAKER GLENN 006712-006748 - Obrycka - Kirby deposition - March 12 2009
- BAKER GLENN 006749-006785 - Padilla - Steve Whitman report
- BAKER GLENN 006786-006793 - Playboy - April 2012 - Officer Finnigan
- BAKER GLENN 006794-006983 - Police Accountability Task Force Report 4/16
- BAKER GLENN 006984-006984 - Ramirez - court order re Finnigan
- BAKER GLENN 006985-006988 - Ramirez - declaration - Oct 20 2011
- BAKER GLENN 006989-007306 - Ramirez - Finnigan, Jerome - depositions
- BAKER GLENN 007309-007332 - United States v. Finnigan - sentencing hearing
- BAKER GLENN 007333-007392 - Report of the Commission on Police Integrity
- BAKER GLENN 007393-007562 - Committee meeting transcripts
- BAKER GLENN 007563-007620 - CPD Internal Affairs SOP
- BAKER GLENN 007621-007828 - FOP Contract- 2003-2007
- BAKER GLENN 007829-008356 - JohnsonvChicago City Docs

- BAKER GLENN 008357-008610 - JohnsonvChicago Duffy Dep
- BAKER GLENN 008611-008663 - Ronald Johnson- Stine report
- BAKER GLENN 008664-008717 - UIC 2013 study of CPD history of cover ups
- BAKER GLENN 008718-008747 - Arias v Chicago Carothers Dep
- BAKER GLENN 008748-008975 - Bond v Utreras Duffy Dep
- BAKER GLENN 008976-009369 - OPS SOP Manual
- BAKER GLENN 009370-009398 - Rules and Regs
- BAKER GLENN 009399-009424 - Arias- Kirby Dep pt 2
- BAKER GLENN 009425-009427 - Release 2015_12_17
- BAKER GLENN 009428-009429 - Release 2016_09_15
- BAKER GLENN 009430-009958 - Spalding SJ
- BAKER GLENN 009959-011626 - CCSAO Subpoena Response Docs
- BAKER GLENN 011627-011627 - Call Spreadsheet
- BAKER GLENN 011628-013005 - 2006 drug case- Baker and Glenn
- BAKER GLENN 013006-014233 - COI
- BAKER GLENN 014234-014298 - Correspondence
- BAKER GLENN 014299-015635 - CR
- BAKER GLENN 015636-015704 - Direct Appeal
- BAKER GLENN 015705-015787 - General Files
- BAKER GLENN 016423-016426 - Invoices
- BAKER GLENN 016427-016744 - Others
- BAKER GLENN 016745-016959 - PC Docs
- BAKER GLENN 016960-018214 - Pleadings
- BAKER GLENN 018215-018853 - Prior Atty File
- BAKER GLENN 018854-020173 - Record, Trial Transcript
- BAKER GLENN 020174-020179 - U of C Event
- BAKER GLENN 020180-020624 - Whistleblower Lawsuit
- BAKER GLENN 020625-021152 - Ben Baker and Clarissa Glenn 06 CR 810
- BAKER GLENN 021153-021481 - Investigation - Baker
- BAKER GLENN 021482-021783 - Ben Baker Trial Transcript
- BAKER GLENN 021784-021989 - Ben Baker Court File 05 CR 8982
- BAKER GLENN 021990-022111 - General Files
- BAKER GLENN 022112-022140 - Watts Sentencing Files
- BAKER GLENN 022141-022158 - Ida B Wells Housing Project Files
- BAKER GLENN 22159 - Audio File
- BAKER GLENN 022433-022844 - Baker IDOC file
- BAKER GLENN 022845-023857 - client documents
- BAKER GLENN 023858-024370 - Illinois v. Carter documents
- BAKER GLENN 024371-024416 - Koconis and Scott Affidavits
- BAKER GLENN 024436-024436 - Ramirez Order Granting Mtn to Modify PO
- BAKER GLENN 024437-024441 - CR273870
- BAKER GLENN 024442-024445 - CR288573
- BAKER GLENN 024446-024458 - CR302560
- BAKER GLENN 024459-024470 - CR1044250

- BAKER GLENN 024471-024488 - CR1049664
- BAKER GLENN 024489-024560 - Mohammed CRs from FOIA
- BAKER GLENN 024561-024574 - 1997 Jimmy GMC Vehicle History Report
- BAKER GLENN 024581-024589 - William Carter Petitions & Orders
- BAKER GLENN 024590-024591 - 09CR14547 - Petition & Order - Bruce Powell
- BAKER GLENN 024593-024907 - CCSAO FOIA 2016 - Part 2
- BAKER GLENN 024908-025715 - Civil case documents against defendants
- BAKER GLENN 025716-025720 - Mot to Consolidate
- BAKER GLENN 025721-027079 - Consolidated Petition & Exhibits
- BAKER GLENN 027094-027135 - People v. Sondra Cartwright - 4-28-09
- BAKER GLENN 027136-027139 - FOIA to Chicago OEMC re Wilbert Moore Homicide
- BAKER GLENN 027140-027318 - FOIA to CPD re Wilbert Moore Homicide

Rule 26(a)(1)(A)(iii). Plaintiff's constitutional rights were violated and he was deprived of his liberty for over two years. He seeks compensation for those losses in an amount to be set by the jury. These damages are not susceptible of precise calculation.

Rule 26(a)(1)(A)(iv). Plaintiff has no documents subject to disclosure under Rule 26(a)(1)(A)(iv).

Respectfully submitted,

/s/Elizabeth Mazur

Elizabeth Mazur

Jon Loevy

Russell Ainsworth

Joshua Tepfer

LOEVY & LOEVY

311 N. Aberdeen St., 3rd Fl.

Chicago, IL 60607

O: 312.243.5900

F: 312.243.5902

elizabethm@loevy.com

Joel A. Flaxman

ARDC No. 6292818

Kenneth N. Flaxman

KENNETH N. FLAXMAN P.C.

200 S Michigan Ave Ste 201

Chicago, IL 60604-2430

O: 312.427.3200

F: 312.427.3930

jaf@kenlaw.com

Attorneys for plaintiff

CERTIFICATE OF SERVICE

I, Elizabeth Mazur, an attorney, certify that on October 24, 2017 I served a copy of Plaintiff's Rule 26(a)(1) disclosures on counsel of record in this case via electronic mail.

/s/Elizabeth Mazur